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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

**IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ERIC B. EVANS IN
SUPPORT OF DEFENDANT GOOGLE
INC.'S RESPONSE IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF
PLAINTIFFS' SUPPLEMENT
REGARDING MOTION TO COMPEL**

I, Eric B. Evans, declare as follows:

1. I am a partner with the law firm of Mayer Brown LLP, counsel for Defendant Google, Inc. (“Google”) in the above-captioned matter. I am admitted to practice law before this Court. I submit this declaration in support of Defendant Google’s Response in Support of Plaintiffs’ Administrative Motion to Seal Portions of Plaintiffs’ Supplement Regarding Motion to Compel Google Documents (“Google’s Response in Support of Motion to Seal”) that is being filed concurrently herewith. As an attorney involved in the defense of this action, unless

1 otherwise stated, I have personal knowledge of the facts stated in this declaration and if called as
2 a witness, I could and would competently testify to them.

3 2. I have read and reviewed the Declaration of Laszlo Bock filed on January 25,
4 2013 (Dkt. 319-3), which describes the competitive harm that Google would suffer if
5 information in the Declaration of William Campbell were made public. Specifically, Mr. Bock
6 testified that were this information made public Google's competitors would discover and
7 therefore better understand, the unique and confidential arrangement between Mr. Campbell and
8 Google regarding his role as senior advisor to Google, including how this arrangement was
9 formalized and documented and the details and express terms and conditions of that arrangement
10 (such as the specific manner in which Mr. Campbell has been, and continues to be, compensated
11 for his work as a senior advisor to Google).

12 3. I have also read and reviewed Plaintiffs' Supplement Regarding Motion to
13 Compel Google Documents, as well as Exhibit 1 to the Declaration of Dean Harvey in Support
14 Thereof that contains transcript excerpts from the deposition of William Campbell. The
15 proposed redactions (as reflected in Google's accompanying Response in Support of Motion to
16 Seal) to Plaintiffs' Supplement Regarding Motion to Compel Google Documents and Exhibit 1
17 to the Declaration of Dean Harvey in Support Thereof discuss or reflect information contained in
18 the Declaration of William Campbell.

19 4. Accordingly, and for the reasons articulated in the Declaration of Laszlo Bock,
20 these excerpts contain highly confidential information, and Google would suffer competitive
21 harm if such excerpts were made public.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on February 20, 2013 in Pacifica, California.

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s/ Eric B. Evans

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Eric B. Evans

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